IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA VALDOSTA DIVISION

UNITED STATES OF AMERIC	CA §
	§
-versus-	§
	§ CASE NO.: 7:23-CR-00072
TERESA PAULO,	§
	§
Defendant.	§

UNOPPOSED MOTION FOR CONTINUANCE OF SENTENCING HEARING

COMES NOW the above-named Defendant, TERESA PAULO (hereinafter "Paulo"), by and through her undersigned counsel of record, and files this, and hereby moves this Honorable Court for an Order continuance. As grounds for this Unopposed Motion for Continuance of Sentencing Hearing, Defendant PAULO states the following:

1

Ms. **PAULO** pled guilty in the above–styled matter (*via* information) on November 2, 2023. The Presentence Investigation Report was filed on February 5, 2024 and objections were filed by both parties. Sentencing is scheduled for July 11, 2024.

2.

Counsel is defending a colleague, Kimberly Copeland, in the matter of *Strayer vs*. *Copeland*, Civil Action Number: SUCV2022000188, in the Superior Court of Wayne County. The matter has been scheduled for trial commencing July 12, 2024 [See **Exhibit** 1] and the parties have more than nine hundred and forty (940) pages of exhibits.

3.

Pursuant to counsel's conversation with AUSA Hannah Couch on July 1, 2024, she does not oppose this **Motion**.

4.

This Unopposed Motion for Continuance of Sentencing Hearing is filed in good faith and not for the purpose of unnecessary delay, especially considering counsel's July 12, 2024 trial mentioned above. A proposed Order is attached hereto.

WHEREFORE, Defendant TERESA PAULO moves this Honorable Court for an Order continuing the sentencing hearing in the above-styled case.

Respectfully submitted, this 2nd day of July 1, 2024.

COPELAND, HAUGABROOK & WALKER

104 East Adair Street Post Office Box 1810 Valdosta, Georgia 31601 Telephone: (229) 247-4617 Facsimile: (229) 242-0109

Email: cwlaw02@bellsouth.net

/s/ Nathaniel Haugabrook, II

NATHANIEL HAUGABROOK, II

Georgia Bar No.: 337970

Attorney for PAULO

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2024, I electronically filed the foregoing **Unopposed**Motion for Continuance of Sentencing Hearing with the Clerk of Court using the CM/ECF system which will send notification of such to all counsel of record.

COPELAND, HAUGABROOK & WALKER

Post Office Box 1810 104 East Adair Street Valdosta, Georgia 31603 Telephone: (229) 247-4617 Facsimile: (229) 242-0109

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/s/Nathaniel Haugabrook, II NATHANIEL HAUGABROOK, II Georgia Bar No. 3337970

Attorney for PAULO

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UNITED STATES OF AMERICA	§	
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	§	
Defendant.	§	

ORDER

Upon consideration of Defendant Teresa Paulo's foregoing Unopposed Motion for Continuance of Sentencing Hearing, the same is hereby **GRANTED**.

SO ORDERED, this _____day of July, 2024.

Honorable W. LOUIS SANDS

Judge, United States District Court for the Middle District of Georgia, Valdosta Division

Order Prepared by:

Nathaniel Haugabrook, II Georgia Bar Number: 337970 Counsel for Defendant

COPELAND, HAUGABROOK & WALKER

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EXHIBIT

1



Judge Robert W. Guy, Ir.

Superior Courts of Georgia, Brunswick Judicial Circuit

Telephone (912) 510-5970 Fax (912) 510-5974 Camden County Courthouse Post Office Box 610 Woodbine, Georgia 31569 Circuit Counties: Appling County Camben County Glyun County Jeff Davis County Wayne County

MEMORANDUM

TO:

Frances Yeargan, Clerk of Superior Court (via email)

Wayne County Sheriff's Office (via email)

Elizabeth Presley, Esq. (via email) Chad Taylor, Esq. (via email) Fred Kopp, Esq. (via email)

C. Foster Lindberg, Esq. (via email)
J. Holder Smith, Esq. (via email)
James L. Hardin, Esq. (via email)

Nathaniel Haugabrook, II, Esq. (via email)

Juanita Holsey, Esq. (via email) Ashleigh Peacock (via email)

FROM:

Hon. Robert W. Guy, Jr.

Brunswick Judicial Circuit

DATE:

June 28, 2024

RE:

Wayne County Trials - Week of July 8, 2024

The following cases are scheduled to be heard on the Court's July 8, 2024 week of jury trials:

Roberts Any R

- 1.) State v. Terri Lynn Vickers, SUCR2023000144
- 2.) Reva Lynn Jeremias v. David M. Heflin, et al., SUCV2022000142

The Court will conduct jury selection and the trial of *State v. Vickers* on Monday, July 8, 2024, at 9:30 AM. Jury selection and the trial of *Jeremias v. Heflin, et al.* will commence on Tuesday, July 9, 2024, at 9:30 AM.

Jeremias will be followed by a <u>bench</u> trial in the following matter, to tentatively commence on Friday, July 12, 2024, at 9:30 AM:

1.) Strayer Electric, LLC v. Kimberly L. Copeland, SUCV2022000188